

# **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,	)	Case No. 16-cv-1054(WMW/DTS)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	<b>Jury Trial Demanded</b>
FEDERAL INSURANCE COMPANY, an	)	
Indiana corporation,	)	
	)	
Defendant.	)	

**PLAINTIFF FAIR ISAAC CORPORATION’S SECOND SET OF INTERROGATORIES  
TO DEFENDANT FEDERAL INSURANCE COMPANY (15-21)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Fair Isaac Corporation (“FICO”) hereby requests that Defendant Federal Insurance Company (“Federal”) answer the following interrogatories, separately and fully, in writing under oath, within thirty days of the date of service of these interrogatories, or at such other time as the parties may agree.

**INSTRUCTIONS AND DEFINITIONS**

The Instructions and Definitions from FICO’s First Set of Requests for Production of Documents and First Set of Interrogatories are incorporated by reference as if fully set forth herein.

**INTERROGATORIES**

**INTERROGATORY NO. 15:** For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Federal and the gross written premium of each related company, including the specific identification of each related company, for each year from 2001-2006. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**INTERROGATORY NO. 16:** For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Federal and the gross written premium of each related company, including the specific identification of each related company, for each year from 2007-2012. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**INTERROGATORY NO. 17:** For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Federal and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

**INTERROGATORY NO. 18:** From the date of first use of the Blaze Advisor® software in the United Kingdom and thereafter by quarter, the gross written premium of each such company, including specific identification of each company, from all insurance policies in connection with which the Software was used.

**INTERROGATORY NO. 19:** From the date of first use of the Blaze Advisor® software in Canada and thereafter by quarter, the gross written premium of each such company, including specific identification of each company, from all insurance policies in connection with which the Software was used.

**INTERROGATORY NO. 20:** From the date of first use of the Blaze Advisor® software in any other country other than the United States, the United Kingdom or Canada, and thereafter by quarter, the gross written premium of each such company, including specific identification of each company, from all insurance policies in connection with which the Software was used.

**INTERROGATORY NO. 21:** From March 30, 2016 to date, identify and describe each instance in which the Blaze Advisor ® software was modified in any way – whether by Chubb & Son, a division of Federal, Federal, or any other entity or person.

Dated: December 29, 2017

MERCHANT & GOULD P.C.

/s/Heather Kliebenstein  
Allen Hinderaker, MN Bar # 45787  
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*Attorneys for Plaintiff FICO*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 29, 2017, a copy of the foregoing was emailed to the following attorneys of record:

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December 29, 2017

s/Heather Kliebenstein  
Heather Kliebenstein